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December 16, 1996

VIA FACSIMILE

Dr. Leah H. Evison
Remedial Project Manager
Mail Code HS-6J
U. S. EPA, Region V
77 W. Jackson Boulevard
Chicago, Illinois 60604

Re: Greater Albion Alliance 2000
Municipal Water Fact-Finding Committee
Albion-Sheridan Township Landfill

Dear Dr. Evison:

Thank you for the status report concerning the Albion-Sheridan Township Landfill site which you furnished us last month at the request of Dr. Lawrence D. Taylor.

As you asked, I enclose a copy of the section of the final draft of the report concerning the landfill Superfund site. We hope to complete the report in the next two or three days. Should you take exception to this presentation, or have other comment, please call as soon as possible.

Very truly yours,

David G. Moore

DGM/ms
encl.

parcel found small amounts of contamination. The Michigan DEQ[75] and the EPA agree that it is a qualified candidate for "brownfield" redevelopment.[76]

The lower parcel, the "Brooks Foundry lagoons," has been nominated for the National Priorities List.[77] That would qualify it for remedial action and cleanup in the federal Superfund program. The shallow and Marshall sandstone aquifers are thought to be hydrogeologically interconnected in the area. Thus the deep aquifer is susceptible to contamination from the site. The east branch of the Kalamazoo River is immediately south of the site. It flows through an ancient drainage channel which was created by glacial runoff in the Wisconsin glacial age. Contaminants from the site have been measured in the nearby river.

3.3.5 *The Sheridan-Albion Township Landfill Site.*[78] A privately owned state-permitted, 30-acre landfill served the City of Albion and the surrounding townships from June 1966[79] until 1981. It is about a half-mile east of Brooks Foundry on E. Erie Road at the east county line. It was managed as a "sanitary landfill," to control rodents and other nuisances. There was relatively little other management of materials and substances dumped there. After the landfill closed in 1981, a transfer station was operated on a site immediately to the north until 1985. The site, one mile east of the city limits, is 1,000 feet west of Amberton Village, a residential subdivision in Parma Township, and 1,200 feet north of the east branch of the Kalamazoo River. It is less than 2 miles from the Clark Street well field.

In the early 1970s the landfill received approval from the Michigan DNR to accept sludges described as insoluble hydroxides and carbonates. Tests in 1984 and 1986 showed that the sludges contained high levels of chromium, cadmium, lead, nickel, chloride and cyanide. The deposits were estimated to be more than 6 feet thick and to occupy as much as 6,000 cubic yards. In 1986, 40 drums were found at the site. Many were leaking. They contained a variety of potentially flammable volatile organic compounds, oil and grease wastes.

1993, cited in Fairbanks memo..

[75] Responsibility for Michigan environmental programs was shifted in 1995 from the Department of Natural Resources to a new "Department of Environmental Quality" (DEQ). DEQ is a new "principal department" created administratively within the executive branch. Its director serves at the pleasure of the governor. Executive order No. 1995-18, July 31, 1995, effective October 1, 1995.

[76] A brownfield is an abandoned industrial property where potential environmental contamination may be acting as an impediment to future redevelopment activities. Any redevelopment activities on such a parcel must include investigation of the soil underneath the building to determine if any contamination exists. Public Act No. 71 of 1975 amended the state's Natural Resources and Environmental Protection Act (Chapter 324 of the Michigan Compiled Laws) with measures aimed at "restoring the economic value of sites of environmental contamination." A report to the legislature on their effectiveness is due before June 5, 1997, according to Section 20112a of the law.

[77] The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), known as Superfund, was enacted by Congress in 1980 to respond to hazardous waste problems that may pose a threat to the environment. The U. S. Environmental Protection Agency (EPA) administers the program. Remedial actions are taken when extensive work is required to clean up a site. Removal actions are begun in cases of imminent danger to the public and the environment to bring a situation under control by stabilizing or stopping the release of hazardous substances. The U. S. EPA considers a variety of factors in choosing remedial or removal action. In Michigan a Superfund site remediation involves the EPA, the Environmental Response Division of the Michigan Department of Environmental Quality (MDEQ), the Michigan Department of Public Health (MDPH), the Environmental Health Division of the Calhoun County Health Department, and numerous consulting firms and laboratories under contract with those agencies.

[78] This section is based generally on two reports prepared by W W Engineering and Science for the U.S. EPA, *Final Presumptive Risk Assessment of the Sheridan-Albion Township Landfill/Albion, Michigan,* and *Final Remedial Investigation Report of the Sheridan-Albion Township Landfill/Albion, Michigan,* both 1994, and on a memorandum to the committee, "Project Update--November 1996," from Leah Evison, U.S. Environmental Protection Agency, Chicago.

[79] *Albion Evening Recorder.* "Old City Waste Yard Closing This Evening." June 9, 1966.

The site was designated a Superfund site by the EPA in 1989. The Michigan DNR fenced part of the site to limit public access.[80] A remedial investigation was made in 1992 and 1993.[81] Exploratory excavations and 31 monitoring wells were used to assess the nature and scope of hazardous materials. A plume of contaminants was found, moving slowly to the southwest from the site in the shallow aquifer, and extending about 600 feet horizontally. It contained numerous organic and inorganic contaminants at low levels. Those included, in one well, arsenic in excess of primary contaminant standards. Arsenic occurs naturally in the Marshall sandstone. In this case, acidic leachates from the landfill released it from chemical bonds in the rock and permitted it to migrate in ground water.

Meanwhile, the EPA was trying to identify the parties responsible for the contamination and cleanup. Although the landfill served the city and surrounding townships, and most residents, businesses and industries in the area are presumed to have sent materials to it, the EPA has identified few "potentially responsible parties." In October 1995 the EPA issued a "unilateral administrative order" to Cooper Industries, Corning, Inc., Decker Manufacturing Corp. and the City of Albion. It required them to design and carry out a cleanup of the site. Among them, only the City of Albion has said it does not intend to comply.[82] ~~The other parties~~ have hired Woodard-Clyde Consultants, Livonia, to design the cleanup and construction plan. "Pre-design" studies were done in late summer 1996.[83] The schedule calls for preliminary design work to be completed in January 1997 and for the final design to be approved in ~~April~~ June 1997. Work is to begin in ~~June~~ July 1997, and completion is scheduled for early 1998. The cleanup plan, on which the design will be based, was selected by EPA in 1995.[84] It calls for the removal of about 200 drums of waste still in the east-central part of the landfill. The site will be graded and some material may be moved in from the edges to consolidate the waste. The entire site will then be covered with 12 inches of sand to aid in gas collection. That will be covered with a flexible membrane liner to stop infiltration of water into the waste. The liner in turn will be covered with 18 inches of soil, six inches of sand for drainage, and six inches of topsoil. The area will then be planted to native species.[85] Gases generated by decomposing waste will be collected and vented.[86] The cleanup plan also calls for monitoring of groundwater. Residential wells close to

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[80] Signs state, "Warning/Keep Out/Area Contaminated with Industrial Chemicals/U.S. Environmental Protection Agency." Toll-free telephone numbers for information are provided.

[81] WW Engineering and Science, *Final Remedial Investigation Report of the Albion-Sheridan Township Landfill/Albion, Michigan.* Prepared for U.S. EPA. Chicago, 1994 (two volumes).

[82] For a number of years of the landfill's operation, the City of Albion contracted for its availability as a municipal waste site, and there is a dispute now between the city and EPA as to whether the city was "operator" of the site.

[83] Including the installation of more monitoring wells (two of which are readily visible between E. Erie Road and the Conrail mainline just west of the site) collecting groundwater samples, identifying the boundaries of the waste, evaluating gas emissions, and studying revegetation options. A detailed report is to be published in December 1996.

[84] In reaching the decision, EPA held public information meetings and accepted comment on its proposals, which were summarized in *Proposed Plan/Albion-Sheridan Township Landfill Superfund Site*, EPA, Chicago, 1994. The plan was introduced at the beginning of the comment period at a public meeting at the Albion Public Library October 5, 1994. See _____ Record of Decision, EPA, 199~~5~~, a copy of which is available at the library.

[85] Preliminary work included a study of revegetation options. It was concluded that the benefits of using native species (improving soil quality, reduced erosion, enhancement of native plant communities, preservation of native plant gene pools and less need for herbicides and mowing) outweigh the ~~lower~~ higher initial cost of planting grass. Evison memo.

[86] Computer modeling was used to predict the volume of gas likely to be generated, and to evaluate the risk to those living in the area. It was determined that the gases will meet air standards without treatment. Evison memo.

the landfill site[87] and the Amberton Village wells will be tested quarterly.[88] Other wells will be tested annually. The plan requires that either recorded restrictions or local ordinances be used to prohibit the drilling of new wells close to the landfill. If the area of arsenic-contaminated groundwater does not decrease in five years, treatment will be required.

3.3.6 *The Cooper Street-Dean Drive (McIntosh Park) Waste Yard Site.* The city opened a waste yard on the northwest side of town about 1952. It was closed June 9, 1966, because it was filled to capacity.[89] McIntosh Park was built over the center of the site; neighborhoods on Dean Drive and Hoaglin Drive roughly define the perimeter. The site is about a mile from the Brownswood wellfield. A monitoring well was installed in 1992 in connection with the Brownswood wellfield study.[90] The well log noted particles of greyish-brown broken glass and occasional pieces of rubber and metal at depths between 5 feet and 17½ feet.[91] Analysis of a sample from the well showed very small amounts of three organic compounds above the detection limit.[92] The Michigan DEQ recently requested monitoring data from the city.

3.3.7 *The Harrington School Dump Site.* The city dump before 1952 was east of Clark Street and north of E. Erie Road. Harrington Elementary School (opened 1957) was built on the site, which is less than a mile from the Clark Street well field. The Albion Public Schools later constructed a bus parking lot and servicing area at the southeast corner of the site. In early August 1991, a 12,000-gallon gasoline tank and a 6,000-gallon diesel fuel tank were removed because they were leaking.[93] After extensive excavation of contaminated soil, which included digging beneath E. Erie Road, the site was backfilled in mid-October 1991.

3.3.8 *Old Dump at W. Erie Road and 25½ Mile Road.* The committee has consistently heard reports from long-time residents of a refuse dump in use decades ago--possibly after the Harrington School site[94] and before the McIntosh site[95]--just east of 25½ Mile Road, and north of W. Erie Road. No documented evidence about the dump has been found.

3.3.9 *The Hayes-Albion Corp. Site.* A leaking underground storage tank site on the

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[87] "[N]o site-related contaminants were detected in any residential wells during previous sampling." Evison memo.

[88] In 1991, two wells in the nearby Amberton Village subdivision, which draw water from the Marshall sandstone, had shown no detectable contaminants. Those wells are cased to a depth of 95 feet. A short distance to the west, in the Orchard Knoll area, two wells had been found contaminated with dichloroethane and trichloroethane. Michigan Department of Natural Resources. *Michigan Sites of Environmental Contamination/Priority Lists/Act 307.* February 1990 for Fiscal Year 1991. Both source of contamination and point of release were listed as "unknown." In 1991 and 1992, the City of Albion extended water mains east to provide service to eight residences and a church in the affected area, on E. Michigan Avenue and Orchard Knoll in Sheridan Township, all at state expense. *1992 Water Department Annual Report.* p. 46.

[89] *Recorder*, June 9, 1966.

[90] Section 3.2.5.1.

[91] Hull & Associates, 1993, Appendix A, log of well No. RW-5.

[92] 1.55 micrograms/*l* of vinyl chloride; 7.36 micrograms/*l* of tetrachloroethene, and 2.39 micrograms/*l* of cis-1,2-Dicholoroethene.

[93] *Albion Recorder.* "School Board appoints Dobbert superintendent." Sept. 4, 1991, p. 1.

[94] See Section 3.3.7.

[95] See Section 3.3.6.